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17
18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 LAS VEGAS SUN, INC., a Nevada
21 corporation,

22 Plaintiff,

23 v.

24 SHELDON ADELSON, et al.,

25 Defendants.

26 AND RELATED COUNTERCLAIMS
27
28

Case No. 2:19-cv-01667-ART-VCF

**JOINT STATUS REPORT PURSUANT TO
ECF NO. 484**

Pursuant to the Special Master's October 4, 2021 Order re: Protocol for Resolving Discovery Disputes and Deposition Scheduling (ECF No. 484) ("Discovery Protocol"), the Parties hereby submit this Joint Status Report identifying the status of document and deposition discovery:

I. Status of Document Productions

a. Defendants' Production Obligations

On April 4, 2023, Defendants produced documents consistent with continuing obligations under Rule 26(e). On April 4, 2023, and April 14, 2023, Defendants produced documents from their experts consistent with continuing obligations in response to subpoenas served on September 26, 2022, and January 23, 2023.

b. The Plaintiff's Production Obligations

On April 13, 2023, and April 19, 2023, Plaintiff produced documents consistent with continuing obligations under Rule 26(e).

II. Status of Depositions

a. Depositions Taken and Already Scheduled

All fact depositions have been completed, and the following expert depositions have been scheduled or taken as indicated below:¹

Deponents	Deposing Party	Dates
Kordalski, David*	Defendants	February 28, 2023
Rainey, Mark*	Plaintiff	March 9, 2023
Aldrich, Larry*	Defendants	March 15, 2023
Picard, Robert*	Defendants	March 21, 2023
Katz, Michael*	Defendants	April 3, 2023
Gundlach, Greg*	Defendants	April 6, 2023
Nolte, David*	Plaintiff	April 10, 2023
Evans, David*	Plaintiff	April 12, 2023
Gottlieb, Barbara*	Defendants	April 18, 2023
Paulson, Ken*	Plaintiff	April 20, 2023
Lamb, Russell	Defendants	May 10, 2023

¹ Asterisks (*) denote depositions that have already been taken.

1 DATED this 28th day of April 2023.

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PROOF OF SERVICE

I hereby certify that on the 28th day of April, 2023, I served a true and correct copy of the foregoing **JOINT STATUS REPORT PURSUANT TO ECF NO. 484** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

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/s/ Ali Lott

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